IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CHURCH OF SCIENTOLOGY OF CALIFORNIA, etc., Plaintiff,	Case No. 78-2053 RMT (Central District of California)
v.	
PAULETTE COOPER, Defendant.	F.S. 81-0342

MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF JOINT MOTION TO QUASH SUBPOENA, AND FOR OTHER RELIEF

INTRODUCTORY STATEMENT

The Church of Scientology has the audacity to appear again in the United States District Court for the District of Columbia. This Scientology action seeks to harass and vilify journalists who have published criticism of this criminal enterprise. As the United States Attorney, Mr. Charles Ruff, informed the Court in the Sentencing Memorandum of the United States submitted to Judge Richey after Scientologists had been convicted in this Court of numerous offenses against the United States,

> "[Scientologists] . . . ordered the theft of documents and memoranda of attorneys representing the United States Government, [they ordered] the execution of smear campaigns and baseless lawsuits for the sole purpose of destroying private individuals who had attempted to exercise their First Amendment rights to freedom of expression. . . ." (Sentencing Memorandum of the United States, Methvin Affidavit, Exhibit E). (Emphasis added.)

The movants here, Eugene Methvin and Jane Denis Smith, are journalists. Mr. Methvin is a Senior Editor for Reader's Digest. Ms. Smith was formerly a Research Editor for Reader's Digest. Scientology's subpoenas to these journalists

Digest because Reader's Digest has published two articles critical of Scientology. In addition, the subpoena is an impermissible attempt to take discovery prior to commencing litigation against Mr. Methvin and Reader's Digest and/or to take discovery for use in proceedings Scientology began in Australia and New Zealand against Mr. Methvin and Reader's Digest.

Respectfully submitted,

WHITE & CASE

By _____

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